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15 Attorneys for Counter-Defendant
16 Union Pacific Railroad Company

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO

20 05-3100 MJJ

21 CASE NO. C 05-3100 MJJ

22 **STIPULATION REGARDING UNION
23 PACIFIC RAILROAD COMPANY'S
24 ANSWER TO DEFENDANTS'
25 COUNTERCLAIM**

26 **(Civil L.R. 5 & 6-1(a))**

27 GRANTED

28 UNIVERSAL PARAGON CORPORATION, a
29 Delaware corporation, and SUNQUEST
30 PROPERTIES, INC., a California corporation,
31 Plaintiffs,

32 v.

33 INGERSOLL-RAND COMPANY LIMITED, a
34 Bermuda corporation; INGERSOLL-RAND
35 CORPORATION, a New Jersey corporation;
36 SCHLAGE LOCK COMPANY, a California
37 corporation; and TOUCH-PLATE
38 INTERNATIONAL, INC., a California
39 corporation,

40 Defendants.

1 INGERSOLL-RAND COMPANY, a New
2 Jersey corporation and SCHLAGE LOCK
COMPANY, a California corporation,

3 Counter-Claimants,

4 v.

5 UNIVERSAL PARAGON CORPORATION, a
6 Delaware corporation; SUNQUEST
7 PROPERTIES, INC., California corporation, and
8 UNION PACIFIC RAILROAD COMPANY, a
Delaware corporation,

9 Counter-Defendants.

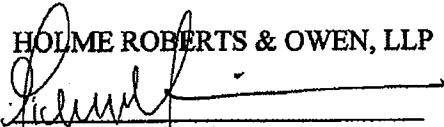
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12 Defendant and counter-claimant Ingersoll-Rand Company, defendant and counter-
13 claimant Schlage Lock Company, defendant and counter-claimant Touch-Plate International, Inc.
14 and counter-defendant Union Pacific Railroad Company, by and through their respective counsel
15 hereby stipulate as follows:

16 Counter-defendant Union Pacific Railroad Company shall have up to and including
17 Friday, February 10, 2006, in which to file its responsive pleading to Defendants' Counterclaim.

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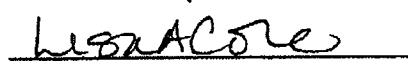
1 Dated: January 26, 2006

HOLME ROBERTS & OWEN, LLP

2 
3 Kenneth W. Lund
4 Michelle Youphkin
5 Attorneys for Defendant, Counter-Claimant and Third
6 Party Plaintiff
7 UNION PACIFIC RAILROAD COMPANY

8 Dated: 1-30-06

9 THELEN REID & PRIEST, LLP

10 
11 Lisa A. Cole
12 Attorneys for Defendant, and Counter-Claimant
13 INGERSOLL-RAND COMPANY; SCHLAGE LOCK
14 COMPANY; and TOUCH-PLATE INTERNATIONAL
15 INC.

16 1/30/2006



PROOF OF SERVICE

STATE OF CALIFORNIA, CITY AND COUNTY OF SAN FRANCISCO

I am employed in the office of Holme Roberts & Owen in San Francisco, California. I am over the age of eighteen years and not a party to the within action. My business address is 560 Mission Street, 25th Floor, San Francisco, CA 94105.

On January 30, 2006, I served the foregoing documents described as:

**STIPULATION REGARDING UNION PACIFIC RAILROAD COMPANY'S ANSWER TO
DEFENDANTS' COUNTERCLAIM**

on the interested party in this action by placing a true and correct copy thereof enclosed in a sealed envelope addressed as follows:

Aron K. Liang
Joseph W. Cotchett
Philip L. Gregory
Cotchett Pitre Simon & McCarthy
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Attorneys for:
**Plaintiffs Universal Paragon Corp
and Sunquest Properties Inc.**

Lisa A. Cole
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408.292.5800
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Attorneys for:
Defendants/Counterclaimants:
**Ingersoll-Rand Company; Schlage Lock
Company; and Touch-Plate International,
Inc.**

BY MAIL: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at San Francisco, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

BY EMAIL: I communicated such document via e-mail to the addressees' email address as indicated above.

(STATE) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

(FEDERAL) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on January 30, 2006 at San Francisco, California.

Molly Morris